

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

BRIAN THOMPSON and
SHEILA THOMPSON,

Plaintiffs,

v.

RYAN CATE and the
CITY of TRINIDAD, TEXAS,

Defendants.

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Civil Action No. 6:24-cv-67

THE CITY OF TRINIDAD'S
UNOPPOSED MOTION FOR EXTENSION OF TIME

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the City of Trinidad, Texas, Defendant in the above-styled and -numbered cause, and files this Unopposed Motion for Extension of Time, and would respectfully show unto the Court as follows:

The City's deadline to file its Reply regarding the Motion to Dismiss for Improper Venue Pursuant to Rule 12(b)(3) and Alternative Opposed Motion to Transfer Venue is Monday, March 4, 2024. Defendant now files its unopposed motion seeking an additional eighteen days to file its Reply to Motion to Dismiss for Improper Venue and Alternative Motion to Transfer Venue so that its Motion is due on or before 11:59 p.m. on Monday, March 22, 2024. Good cause exists for this request.

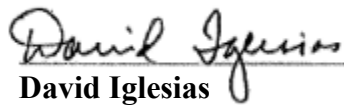
The undersigned will be out of the country beginning March 1, 2024, through March 14, 2024. Additionally, the undersigned represents Texas Association of Counties in *Chris Hunter v. Texas Association of Counties, et al.*, Cause No. 636-19, in the 115th District Court, Upshur County, Texas, and will be preparing for a mediation scheduled for the afternoon of Friday, March

15, 2022. Lastly, the undersigned will serve as a speaker for the Texas Association of Counties Human Resources Conference, scheduled on Wednesday, March 20, through Friday, March 22, 2024, which will require preparation.

This extension is not requested solely for the purposes of delay, but so that justice may be done. Plaintiff is not opposed to the relief requested in this Motion.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests that the Court grants its Motion for Extension of Time, and for any other relief, at law or in equity, to which it may show itself to be justly entitled.

Respectfully submitted,



David Iglesias

Lead Counsel

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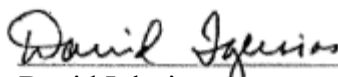
1412 Main Street, Suite 608

Dallas, Texas 75202

**COUNSEL FOR DEFENDANT,
CITY OF TRINIDAD, TEXAS**

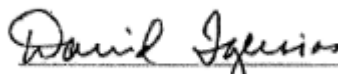
CERTIFICATE OF SERVICE

I hereby certify that on February 29, 2024, a copy of the foregoing was transmitted to all counsel of record in the foregoing case via electronic mail and the Court's electronic filing system.


David Iglesias

CERTIFICATE OF CONFERENCE

I hereby certify that on February 26, 2024, the undersigned attorney contacted counsel for Plaintiff regarding his position on this Motion. Plaintiff's counsel is unopposed to the relief requested in this Motion.


David Iglesias